

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROBERT MAKOWSKI,

Plaintiff,

-against-

UNITED BROTHERHOOD OF CARPENTERS AND
JOINERS OF AMERICA, DISTRICT COUNSEL OF
NEW YORK CITY and VICINITY OF THE UNITED
BROTHERHOOD OF CARPENTERS AND JOINERS
OF AMERICA, LOCAL 157 OF DISTRICT COUNSEL
OF NEW YORK CITY and VICINITY OF THE UNITED
BROTHERHOOD OF CARPENTERS AND JOINERS OF
AMERICA, LOCAL 608 OF DISTRICT COUNSEL OF
NEW YORK CITY and VICINITY OF THE UNITED
BROTHERHOOD OF CARPENTERS AND JOINERS
OF AMERICA, LOCAL 608 NORTH OF DISTRICT
COUNSEL OF NEW YORK CITY and VICINITY OF
THE UNITED BROTHERHOOD OF CARPENTERS
and JOINERS OF AMERICA, LOCAL 45 OF DISTRICT
COUNSEL OF NEW YORK CITY and VICINITY OF THE
UNITED BROTHERHOOD OF CARPENTERS AND
JOINERS OF AMERICA, DOUGLASS J. MCCARRON,
DENIS SHIEL, FRED KENNEDY, BILL HANLEY,
MARTIN DEVEREAUX, GEORGE DILACIO,
VIN TADDEO, SAL ANTONUCCI, NATIONAL
ENVIRONMENTAL SAFETY COMPANY, INC.,
FELIX "DOE," JR. FELIX "DOE" SR., TOM "DOE",
NOEL "DOE," "JOHN DOE 1-8," "JOHN DOE INC. 9-15",
AND METROPOLITAN ARCHITECTURAL
WOODWORK, LLC.

Defendants.

(JAB 8/13/08)
SCANNED

Case No. 08-CV-6150(PAC)

MOTION TO ADMIT
COUNSEL PRO HAC VICE

FILED
AUG 13 2008
CLERK OF COURT
SOUTHERN DISTRICT OF NEW YORK

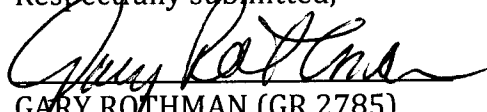
Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Gary Rothman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of Brian F. Quinn, Esq., of DeCarlo, Connor & Shanley, P.C., 101 Constitution Avenue, N.W., Tenth Floor, Washington, D.C. 20001.

Brian F. Quinn is a member in good standing of the State Bar of Georgia and the Bar of the District of Columbia per the District of Columbia Court of Appeals. Attached hereto and marked as Exhibits "A" and "B", respectively, are Certificates in Good Standing from the State Bar of Georgia and the District of Columbia Court of Appeals.

There are no pending disciplinary proceedings against Brian F. Quinn in any State or Federal Court.

Dated: August ~~1~~ 2, 2008
New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gary Rothman", is written over the typed name.

GARY ROTHMAN (GR 2785)
O'DWYER & BERNSTIEN, LLP
Paul O'Dwyer Way
52 Duane Street - 5TH Floor
New York, New York 10007
(212) 571-7100 (Tel #)
(212) 571-7124 (Fax)

CERTIFICATE OF SERVICE

I, GARY ROTHMAN, hereby certify that on this 13TH day of August 2008, I have served the Motion to Admit Counsel Pro Hac Vice, Affidavit in Support of Motion to Admit Counsel Pro Hac Vice and Order for Admission Pro Hac Vice, via first class mail by depositing a copy of same in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to each of the following persons at the last known address set forth:

Marshall B. Bellovin, Esq.
BALLON, STOLL , BADER & NADLER, P.C.
729 SEVENTH AVENUE, 17TH FLOOR
NEW YORK, NEW YORK 10019

A handwritten signature in black ink, appearing to read "DR GJ", is located in the lower right portion of the page.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

ROBERT MAKOWSKI,)

Plaintiff,)

-against-)

Case No. 08-CV-6150(PAC)

UNITED BROTHERHOOD OF CARPENTERS AND)

JOINERS OF AMERICA, DISTRICT COUNSEL OF)

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UNITED BROTHERHOOD OF CARPENTERS AND)

JOINERS OF AMERICA, DOUGLASS J. MCCARRON,)

DENIS SHIEL, FRED KENNEDY, BILL HANLEY,)

MARTIN DEVEREAUX, GEORGE DILACIO,)

VIN TADDEO, SAL ANTONUCCI, NATIONAL)

ENVIRONMENTAL SAFETY COMPANY, INC.,)

FELIX "DOE," JR. FELIX "DOE" SR., TOM "DOE",)

NOEL "DOE," "JOHN DOE 1-8," "JOHN DOE INC. 9-15",)

AND METROPOLITAN ARCHITECTURAL)

WOODWORK, LLC.)

Defendants.)

-----X

STATE OF NEW YORK)

) SS.:

COUNTY OF NEW YORK)

GARY ROTHMAN, being duly sworn, hereby deposes and says as follows:

AFFIDAVIT IN SUPPORT
OF MOTION TO ADMIT
COUNSEL PRO HAC VICE

1. I am a partner in the law firm of O'DWYER & BERNSTIEN, LLP, counsel for Defendants DISTRICT COUNSEL [sic] OF NEW YORK CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 157 OF THE DISTRICT COUNSEL [sic] OF NEW YORK CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 608 OF THE DISTRICT COUNSEL [sic] OF NEW YORK CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 608 NORTH OF DISTRICT COUNSEL [sic] OF NEW YORK CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 45 OF THE DISTRICT COUNSEL [sic] OF NEW YORK CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, DENIS SHIEL [sic], MARTIN DEVEREAUX, VIN TADDEO and SAL ANTONUCCI in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of this motion to admit Brian F. Quinn as counsel pro hac vice to represent Defendants United Brotherhood of Carpenters and Joiners of America, and Douglas J. McCarron.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on January 12, 1981. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Brian F. Quinn since 2000.

4. Mr. Quinn is a member at DeCarlo, Connor & Shanley, P.C. in Washington, District of Columbia.

5. I have found Mr. Quinn to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

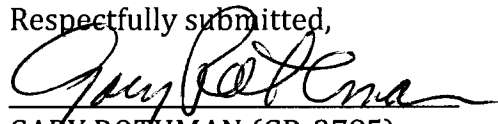
6. Accordingly, I am pleased to move the admission of Brian F. Quinn, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Brian F. Quinn, pro hac vice, which is attached hereto as Exhibit C.

WHEREFORE, it is respectfully requested that the motion to admit Brian F. Quinn, pro hac vice, to represent Defendants United Brotherhood of Carpenters and Joiners of America and Douglas J. McCarron in the above captioned matter, be granted.

Dated: New York, New York
August 12, 2008

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gary Rothman", is written over a horizontal line.

GARY ROTHMAN (GR-2785)
O'DWYER & BERNSTEIN, LLP
Paul O'Dwyer Way
52 Duane Street – 5th Floor
New York, New York 10007
Telephone: (212) 571-7100
Facsimile: (212) 571-7124

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		
ROBERT MAKOWSKI,)	
)	
Plaintiff,)	
-against-)	Case No. 08-CV-6150(PAC)
)	
UNITED BROTHERHOOD OF CARPENTERS AND)	
JOINERS OF AMERICA, DISTRICT COUNSEL OF)	
NEW YORK CITY and VICINITY OF THE UNITED)	ORDER
BROTHERHOOD OF CARPENTERS AND JOINERS)	
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WOODWORK, LLC.,)	
)	
Defendants.)	
-----X		

Upon the motion of Gary Rothman, attorney for Defendants DISTRICT COUNSEL
[sic] OF NEW YORK CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS
AND JOINERS OF AMERICA, LOCAL 157 OF THE DISTRICT COUNSEL [sic] OF NEW YORK
CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF
AMERICA, LOCAL 608 OF THE DISTRICT COUNSEL [sic] OF NEW YORK CITY AND VICINITY

OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 608 NORTH OF DISTRICT COUNSEL [sic] OF NEW YORK CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 45 OF THE DISTRICT COUNSEL [sic] OF NEW YORK CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, DENIS SHIEL [sic], MARTIN DEVEREAUX, VIN TADDEO and SAL ANTONUCCI and said sponsor attorney's affidavit in support,

IT IS HEREBY ORDERED that, Brian F. Quinn, Esq., of DeCarlo, Connor & Shanley, P.C., 101 Constitution Avenue, N.W., Tenth Floor, Washington, D.C. 20001, Telephone: (202) 589-1151, Facsimile: (202) 589-0105, bquinn@deconsel.com is admitted to practice pro hac vice as counsel for United Brotherhood of Carpenters and Joiners of America, and Douglas J. McCarron, in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: August 12, 2008
New York, New York

Paul A. Crotty,
United States District Court Judge



STATE BAR OF GEORGIA

Lawyers Serving the Public and the Justice System

Mr. Brian Francis Quinn
c/o DeCarlo Connor & Shanley PC
101 Constitution Ave., N.W., 10th Floor
Washington, DC 20001

CURRENT STATUS: Active Member-Good Standing
DATE OF ADMISSION: 01/30/1989
BAR NUMBER: 591356
TODAY'S DATE: August 4, 2008

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition
N/A	N/A	N/A

The prerequisites for practicing law in the State of Georgia are as follows:

- Must be certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, which is the highest court needed for individuals to practice law in the State of Georgia.
- Enrolled with the State Bar of Georgia, which is an arm of the Supreme Court of Georgia.

Attorneys licensed in Georgia and whose membership is current are eligible to practice law in Superior Court. Attorneys may, upon application, apply for admission to the Supreme, District and State Court of Appeals.

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by **State Bar Rule 1-204**. The member is current in license fees and is not suspended or disbarred as of the date of this letter.



STATE BAR OF GEORGIA

Brandy Preston

Official Representative of the State Bar of Georgia

HEADQUARTERS

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Atlanta, Georgia 30303
(404) 527-8700 ■ (800) 334-6865
FAX (404) 527-8717
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SOUTH GEORGIA

244 E. Second Street (Zip 31794)
P.O. Box 1390
Tifton, Georgia 31793-1390
(229) 387-0446 ■ (800) 330-0446
FAX (229) 382-7435



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

BRIAN FRANCIS QUINN

was on the 7TH day of OCTOBER, 1996

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 24, 2008.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk